

FILED
2025 APR 14 AM 11:55
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE NASHVILLE DIVISION**

Case No. 3: 25-CV-00288

Dr. Regina Jordan-Sodiq Pro Se Plaintiff, vs. The State of Tennessee, et.al., and **PennyMac Loan Services, LLC** Defendant.

Plaintiff's Response Opposing Defendant's Second Motion to Dismiss

Introduction

Plaintiff, Dr. Regina Jordan-Sodiq, respectfully submits this response opposing Defendant PennyMac Loan Services, LLC's renewed motion to dismiss. Plaintiff acknowledges the procedural concerns raised by Defendant and confirms that all deficiencies in service of process are actively being addressed to ensure compliance with Rule 4(m) of the Federal Rules of Civil Procedure and Tennessee Rule of Civil Procedure 4.05(a). Plaintiff also asserts that the substantive merits of her claims warrant denial of Defendant's motion.

Addressing the Service of Process Issue

Defendant alleges failure to properly serve the summons and complaint within the 90-day period required by Rule 4(m). Plaintiff responds as follows:

1. Timeline and Proof of Service:

- On March 4th, Defendant filed its first motion to dismiss.
- On March 17, Plaintiff re-served the summons and complaint on Defendant's Tennessee registered agent, CT Corporation System, located at **300 Montvue Road, Knoxville, TN 37919**. And will resend both summons and complaint on April 8th 2025.
- Plaintiff served Defendant's California office via USPS with the summons and complaint.
- Subsequently, Plaintiff served Defendant's Tennessee registered agent, CT Corporation System, following case removal to federal court.
- Attached documentation, including the court-stamped summons, USPS tracking receipts, and proof of delivery, demonstrates Plaintiff's adherence to procedural rules.

2. Good Faith and Diligence:

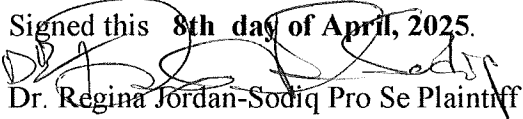
- Plaintiff acted in good faith throughout the service process and promptly addressed any confusion regarding Defendant's registered service address and jurisdictional transitions. Plaintiff respectfully requests the Court's discretion in recognizing these efforts.
- Any perceived delay in service resulted from confusion regarding Defendant's registered service address and jurisdictional transitions upon case removal. Plaintiff acted promptly to address these challenges and confirms that corrected

Affidavit of Service

Affidavit of Dr. Regina Jordan-Sodiq I, Dr. Regina Jordan-Sodiq, being duly sworn, declare under penalty of perjury as follows:

1. On March 17, 2025, I served Defendant's Tennessee registered agent, CT Corporation System, located at **300 Montvue Road, Knoxville, TN 37919**.
2. Service was completed via USPS Certified Mail confirmation, with tracking number 9410 8301 0935 5003 0551 68. Proof of delivery is attached as Exhibit B and C.
3. I affirm that all actions were undertaken in good faith and with diligence to comply with procedural rules.

Signed this **8th day of April, 2025**.


Dr. Regina Jordan-Sodiq Pro Se Plaintiff

NOTICE OF SERVICE

To: Noah J. Mason Troutman Pepper Locke LLP, 600 Peachtree Street, NE Suite 3000, Atlanta GA 30308

Plaintiff Dr. Regina Jordan-Sodiq hereby provides notice to the Court and opposing counsel of service of the attached response to Defendant Pennymac Mortgage LLC's Motion to Dismiss, along with related exhibits. Service has been executed via:

1. **USPS Certified Mail confirmation receipt** requested, sent on April 8, 2025.
2. **Email Delivery** to the email address on record: noah.mason@troutman.com.

Enclosed within this filing are the March 17th response, April 4th motion for expedited hearing and subsequent affidavit attesting to compliance with Tennessee Rules of Civil Procedure. Attached documentation includes the confirmation return receipts requests and USPS mailing record for verification.

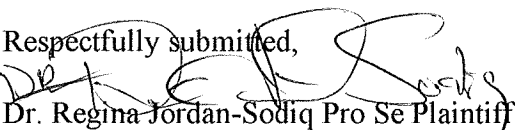
Certificate of Service

Certificate of Service I hereby certify that on **April 8, 2025**, a true and correct copy of the foregoing response was served upon Defendant PennyMac Loan Services, LLC's registered agent, CT Corporation System, at the following address:

CT Corporation System 300 Montvue Road Knoxville, TN 37919

Service was completed by **USPS Certified Mail confirmation**, with proof of delivery attached.

Respectfully submitted,


Dr. Regina Jordan-Sodiq Pro Se Plaintiff

service efforts are now underway to eliminate any outstanding procedural deficiencies

3. **Affidavit of Service:**

- Plaintiff attaches her sworn affidavit as Exhibit A, attesting to the steps taken to serve Defendant within the required timeframe.

4. **Request for Clarification:**

- To prevent future procedural issues, Plaintiff respectfully requests that Defendant specify the precise location designated for service of process to eliminate ambiguity and delays.

5. **Equity and Diligence:** Plaintiff respectfully requests the Court's discretion in considering Plaintiff's good faith efforts and equity concerns, prioritizing the substantive merits of Plaintiff's claims over technical procedural arguments.

Substantive Grounds Supporting Plaintiff's Claims

While Defendant contends that Tennessee criminal statutes cited in Plaintiff's complaint do not independently support civil claims, Plaintiff asserts that the factual allegations substantiate actionable causes of action under Tennessee civil law. Plaintiff specifically alleges the following:

1. **Intentional Infliction of Emotional Distress (IIED):** Defendant's deliberate and outrageous conduct—including psychological harassment and predatory lending practices—was intended to cause severe emotional harm.
2. **Negligent Infliction of Emotional Distress (NIED):** Defendant failed to exercise reasonable care, foreseeably causing emotional and psychological harm to Plaintiff, a vulnerable, disabled veteran.
3. **Civil Conspiracy:** Defendant's alleged collaboration with others to perpetuate cycles of harassment, abuse, and financial exploitation constitutes an agreement to engage in unlawful conduct, resulting in compounded harm to Plaintiff. *Dr. Regina Jordan-Sodiq*

Request for Relief

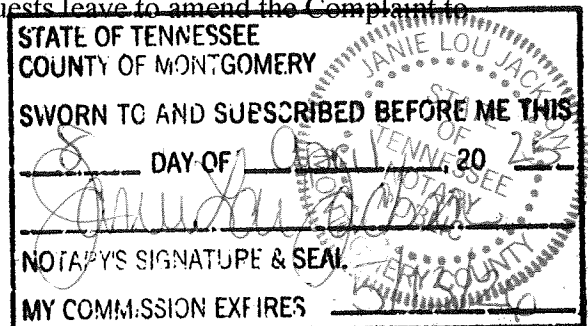
Plaintiff respectfully requests that this Honorable Court deny Defendant's motion to dismiss on the following grounds:

1. Plaintiff has addressed procedural concerns regarding service of process and will ensure compliance with all applicable rules.
2. Plaintiff's claims are grounded in specific factual allegations and substantiate valid causes of action under Tennessee civil law.

For the foregoing reasons, Plaintiff respectfully requests that the Court deny Defendant's Motion to Dismiss in its entirety. In the alternative, Plaintiff requests leave to amend the Complaint to address any deficiencies identified by the Court.

Respectfully submitted,

Dr. Regina Jordan-Sodiq
Dr. Regina Jordan-Sodiq Pro Se Plaintiff



CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading) Response Opposing Defendants' Second Motion to Dismiss has been served on:

(Name) Kimberly S. Geirs
(Address) 219 Church Street
(Address) Suite 3300, Nashville TN 37203

(Name) Katherine R. Rogers
(Address) Butler & Freeman, LLP
(Address) 222 Second Ave South, Suite 2000
Nashville TN 37201

(Name) Stanley Mitchell Ross
(Address) 308 S. 2nd St
(Address) Clarksville TN 37040

(Name) Jason W. Callen
(Address) C & L Gates LLP
(Address) 501 Commerce Street
Suite 1500, Nashville TN 37203

(Name) Tracey Knight
(Address) 308 S. 2nd Street
(Address) Clarksville TN 37040

(Name) Dr Christopher Murphy
(Address) Butler Snow LLP, Nashville Building
(Address) 1320 Adams St, Suite 1400
Nashville TN 37208

(Name) Noah Jordan Mason
(Address) 600 Peachtree Street, NE, Suite
(Address) Atlanta GA 30308 3000

(Name) John H. Dollarhide
(Address) Butler Snow LLP
(Address) 150 3rd Avenue South Suite 1600
Nashville TN 37201

(Name) Cole William Schott
(Address) 3102 West End Ave, Suite 1100
(Address) Nashville TN 37203

on the _____ day of _____ 20____

Continue -

Signature

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)

Response
Forney Marc Motion to
Dismiss

(Name)

W. Scott Sims

(Address)

3102 West End Avenue, Suite 1100

(Address)

Nashville TN 37203

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

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on the *14th* day of *April*

, 20 *28*

[Signature]
Signature